Case 5:13-cr-00486-EJD Document 147 Filed 04/30/15 Page 1 of 2

1 2 3 4 5 6	FRANK R. UBHAUS, CA STATE BAR NO. 46085 BERLINER COHEN TEN ALMADEN BOULEVARD ELEVENTH FLOOR SAN JOSE, CALIFORNIA 95113-2233 TELEPHONE: (408) 286-5800 FACSIMILE: (408) 998-5388 frank.ubhaus@berliner.com ATTORNEYS FOR PLAINTIFF DEFENDANT CUONG DANG, AKA CALVIN DANG	Сао
7 8	UNITED STATES	DISTRICT COURT
9	NORTHERN DISTRICT OF CALIFORNIA	
10	SAN JOSE DIVISION	
11	The United States of America,	CASE NO. CR13 00486 EJD
12	Plaintiff,	STIPULATION AND ORDER FOR MODIFICATION OF RELEASE
13	V.	CONDITIONS
14	Cuong Cao Dang, aka Calvin Dang,	
15	Defendant.	
16		
17 18	WHEDEAC the Defendant Calvin Den	a vyoa initialad nalaasad an hand in this mattan an
	WHEREAS, the Defendant Calvin Dang was initialed released on bond in this matter on	
19	August 7, 2013 on condition that he post a \$2.5 million bond secured by real property and on the	
20	further condition that he be placed under "house arrest" subject to electronic monitoring and	
21	WHEREAS, this Court on September 3, 2013 amended the conditions of release to include	
22	GPS monitoring, home confinement and travel restriction to Santa Clara County, and	
23	WHEREAS, on August 11, 2014 this Court removed the condition of GPS monitoring but	
24	required that the Defendant submit to a curfew with location monitoring, and	
25	WHEREAS, the Defendant has abided by all of the terms of release imposed herein, and	
26	WHEREAS, the Plaintiff has no objection to the removal of the location monitoring	
27	condition hereto fore imposed,	
28		
	CASE NO. CR13 00486 EJD	-1-

STIPULATION AND ORDER FOR MODIFICATION OF RELEASE CONDITIONS

4845-8648-4514v3 FRU\22573001

Case 5:13-cr-00486-EJD Document 147 Filed 04/30/15 Page 2 of 2

1	GOOD CAUSE APPEARING THEREFORE, and based on the stipulation of the parties, it is		
2	hereby ordered that the conditions for release on bond heretofore imposed on the Defendant, Cuong		
3	Cao Dang, aka Calvin Dang, should be, and the same are hereby, modified in the following respect:		
4	the requirement that the Defendant be subject to electronic location monitoring is removed.		
5			
6	SO STIPULATED:		
7	DATED: APRIL 30, 2015	MELINDA HAAG UNITED STATES ATTORNEY	
8		UNITED STATES ATTORNET	
9		BY: <u>/s/ David R. Callaway</u> David R. Callaway	
10		ASSISTANT UNITED STATES ATTORNEY	
11			
12	DATED: APRIL 30, 2015	BERLINER COHEN	
13			
14		BY: <u>/s/ Frank R. Ubhaus</u> Frank R. Ubhaus	
15		Attorneys for Plaintiff Defendant Cuong Cao Dang, aka Calvin Dang	
16			
17	SO ORDERED:		
18	DATED: 4/30/2015		
19	DATED, 4/30/2013		
20		BY: Parl S. Alene	
21		HONORABLE PAUL S. GREWAL UNITED STATES MAGISTRATE JUDGE	
22			
23			
24			
25			
26			
27 28			
20	CASE NO. CD12 00494 E ID		

CASE NO. CR13 00486 EJD